

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST by and through MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY on behalf of its members; SHAKETA REDDEN; DORETHEA FRANKLIN; TANQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

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**STIPULATED MOTION TO AMEND BRIEFING SCHEDULE**  
**DEADLINES ON CLASS CERTIFICATION**

The Parties respectfully move to amend the scheduling order to extend the briefing schedule deadlines by approximately ten days.

In support of this motion, the Parties state as follows:

1. Pursuant to the Parties' Stipulated Motion for Briefing Schedule on Class Certification, the Court set the following deadlines: (a) Defendants opposition to the Motion for Class Certification shall be filed electronically no later than July 3, 2024; (b) Plaintiffs' reply to Defendants' opposition shall be filed electronically no later than July 31, 2024; and (c) if deemed necessary, oral argument shall be scheduled at a date and time to be determined by the Court. Dkt. No. 214.

2. Defendants have been diligently drafting their opposition papers; however, due to the complexity and breadth of claims and defenses in this action, Defendants require more time to properly oppose Plaintiffs' Motion for Class Certification.

3. Accordingly, the Parties respectfully request that the deadlines be extended as follows:

<b>Deadline</b>	<b>Current Date</b>	<b>Modified Date</b>
Defendants' Opposition to the Motion for Class Certification	July 3, 2024	July 12, 2024
Plaintiffs' Reply to Defendants' Opposition	July 31, 2024	August 9, 2024

The Parties respectfully request that the Court so order dates agreed upon in the amended briefing schedule above, and thank the Court in advance for its consideration.

Dated: Buffalo, New York  
June 26, 2024

/s/ Peter A. Sahasrabudhe

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2024, the above Stipulation to Amend Briefing Schedule for Motion to Certify Class was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Peter A. Sahasrabudhe

Peter A. Sahasrabudhe